



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

DANIEL G. SAAVEDRA
Assistant Corporation Counsel
Phone: (212) 356-0892
Fax: (212) 356-3509
Email: dsaavedr@law.nyc.gov

November 13, 2017

BY E.C.F.

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Jeremias Julio v. Officer Theophile, et al.,
17 Civ. 4347 (NGG) (VMS)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter, Corporation Counsel of the City of New York, and the attorney assigned to the defense of the above-referenced matter. Defendants Officer Theophile and Sgt. Figliozzi (hereinafter “defendants”) write, on behalf of the parties, to respectfully request an additional fourteen (14) days, from November 13, 2017 until November 27, 2017, to file the joint letter required by the Court’s September 27, 2017 Order.

This additional time is necessary because the parties are still attempting to mediate their discovery disputes before involving the Court. An additional fourteen days should provide sufficient time for the parties to be able to present the Court with any ripe disputes regarding the production of disciplinary documents which cannot be resolved. The parties are hopeful that they will be able to narrow any such disputes significantly before the 27th and aim to use the aforementioned letter as an avenue to address other discovery disputes beyond disciplinary records. Accordingly, the parties jointly request an additional fourteen (14) days, from November 13, 2017 until November 27, 2017, to file the joint letter required by the Court’s September 27, 2017 Order.

The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Daniel G. Saavedra
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Gabriel P. Harvis, Esq. (by ECF)
Attorney for Plaintiff